

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

LISA MINTON,

Plaintiff,

v.

TRUMBULL BOTTLED WATER, INC.,

Defendant.

Case No. 1:05-cv-878-CSC

RESPONSES AND OBJECTIONS TO PLAINTIFF'S
INTERROGATORIES AND REQUESTS FOR PRODUCTION

Defendant Trumbull Bottled Water, Inc. ("Trumbull") submits the following responses and objections to the plaintiff's discovery requests.

Responses and Objections to Interrogatories

1. *Please state the name, present address, job title or position of the person or persons answering these interrogatories.*

Jay N. Trumbull
President, Trumbull Bottled Water, Inc.
315 E. 15th Street
Panama City, Florida 32405

2. *Please identify all management, officers and owners of Trumbull Bottled Water, Inc. d/b/a Culligan of the Wiregrass (hereinafter "Trumbull").*

Jay N. Trumbull, President
Denslow A. Trumbull, Vice President

3. *Please identify and describe any additional companies, including the proper company name, other than the location in Dothan, Alabama, which are owned, operated or controlled by Trumbull.*

Trumbull also operates a facility in Panama City, Florida under the same ownership and company name.

4. *For the individuals hired during the previous five years, state their full name, sex, date of hire including whether or not the individual was a new hire or promoted from within, their job position, rate of pay, and date of their employment ended and reason(s) such employment ended (i.e. reason for termination, reason for quit, retired, or still employed).*

Counsel for Trumbull objects to this interrogatory on the grounds that it is overly broad, invasive of the privacy rights of people who are not parties to this lawsuit, and not reasonably calculated to lead to the discovery of admissible evidence. The plaintiff did not apply for any position with Trumbull, and alleges only that she was interested in the advertised position of Route Sales in the Dothan branch. Trumbull therefore contends that the only relevant information sought by this request is the pay received by employees who have been hired into the Route Sales position.

Subject to and without waiving its objections, Trumbull states that during the past five years, the following employees have been hired as Route Sales representatives:

Mark A. Troutman
Male
Employed 12-31-01 to 6-4-02
New hire
\$400 bi-weekly plus commissions
Quit to take job with another company

Jeremy A. Ziegler
Male
Employed 6-2-03 to 9-10-03
New hire
\$400 bi-weekly plus commissions
Quit

F. Allan Carey
Male
Employed 3-1-04 to present
New hire
\$400 bi-weekly plus commissions

William M. Nobles

Male

Employed 2-28-05 to 7-1-05

New hire

\$400 bi-weekly plus commissions

Quit following transfer to bottled water plant; unable to perform work

Darren McIver

Male

Employed 7-2-01 to present

New hire

\$550 bi-weekly plus commissions

David S. Murray

Male

Employed 9-15-03 to present

New hire

\$550 bi-weekly plus commissions

Kyle J. Christian

Male

Employed 1-20-05 to present

Transferred from bottled water plant June 2005

\$550 bi-weekly plus commissions

Ragan J. Tidwell

Male

Employed 11-15-04 to present

New hire

\$550 bi-weekly plus commissions

Christopher R. Kibler

Male

Employed 10-13-03 to present

New hire

\$650 bi-weekly plus commissions

Timothy Downen

Male

Employed 6-12-02 to present

New hire

\$550 bi-weekly plus commissions

Steve Adams
Male
Employed 4-26-01 to 2-26-03
New hire
\$400 bi-weekly plus commissions
Quit; no reason on record

Michael C. Ivey
Male
Employed 12-31-01 to 3-1-01
New hire
\$400 bi-weekly plus commissions
Quit to take job with another company

Ross D. Oldham
Male
Employed 7-26-02 to 1-30-03
New hire
\$400 bi-weekly plus commissions
Quit; moved from area

Steve Aplin
Male
Employed 2-10-03 to 4-7-03
New hire
\$400 bi-weekly plus commissions
Quit to return to school

Jeremy Sowell
Male
Employed 4-24-03 to 12-24-04
New hire
\$400 bi-weekly plus commissions
Quit; unable to adequately perform job duties

George R. Grimes
Male
Employed 1-28-05 to present
New hire
\$400 bi-weekly plus commissions

No females have applied for a Route Sales position during the past five years.